

KEVIN J. KEATING
ATTORNEY AT LAW
SUITE 501
666 OLD COUNTRY ROAD
GARDEN CITY, NEW YORK 11530-2004

(516) 222-1099

TELECOPIER
(516) 683-8410

MANHATTAN OFFICE:
EMPIRE STATE BUILDING
350 FIFTH AVENUE, SUITE 5411
NEW YORK, N.Y. 10118
(212) 964-2702

February 10, 2014

VIA ECF

Honorable Sandra J. Feuerstein
United States District Court
Eastern District of New York
P. O. Box 9014
Central Islip, NY 11722

Re: United States v. Munteanu
Ind. CR12-0698

Dear Judge Feuerstein:

As you are aware, I am attorney for Mr. Munteanu. I write to respectfully request that Mr. Munteanu be permitted to execute a Financial Affidavit in anticipation of the assignment of counsel under the Criminal Justice Act.

I was retained to represent Mr. Munteanu in November, 2012. My agreement provided for the payment of an initial flat fee of \$25,000 to be followed by the payment of a subsequent fee for pre-trial hearings/trial. As the Court is aware, a considerable amount of work has already been completed on Mr. Munteanu's behalf. Among other things, I have filed several motions and pre-trial suppression hearings have already been held. In addition, discovery in this case has involved the production of numerous recordings and documentary evidence. Not long ago, the government filed a Superseding Indictment in this matter which has led to the production of additional items of discovery. In short, I have already expended countless hours on Mr. Munteanu's behalf in this matter.

Recently, I spoke with Mr. Munteanu's mother with regard to her ability to make payment for my continued representation of Mr. Munteanu. She has advised me that she is not in the financial position to make such a payment.

With this, it appears that Mr. Munteanu is entirely without funds which would allow him to continue my retention in this matter. It would appear that he certainly qualifies for the assignment of an attorney under the Criminal Justice Act.

With this, I would respectfully request that Mr. Munteanu be produced to the courthouse so that he can execute a CJA Financial Affidavit and be interviewed by pre-trial services.

Finally, as the Court is aware, I am a member of the CJA panel and would certainly be willing to continue to represent Mr. Munteanu in that capacity.

Thank you for your consideration.

Very Truly Yours,


KEVIN J KEATING

KJK:cf

cc: Michael Robotti, Esq.
Clerk of the Court
Eduard Munteanu